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*Attorneys for Defendants Navient Corporation, John F. Remondi,
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE NAVIENT CORPORATION
SECURITIES LITIGATION

Case No. 1:17-cv-08373-RBK-AMD

**NOTICE OF MOTION TO
DISMISS**

ORAL ARGUMENT REQUESTED

Motion Day: August 5, 2019¹

¹ On March 29, 2019, this Court entered an Order Granting Time To Move, Plead Or Otherwise Respond To The Second Amended Complaint (D.I. 35). That order established a schedule governing the filing of the second amended complaint and Defendants' response thereto in the above-captioned matter. That schedule provides that, should Defendants move to dismiss the Second Amended Complaint, Lead Plaintiff should have until and including June 13, 2019 to oppose the motion to dismiss and Defendants should have until and including July 29, 2019 to file a reply in support of their motion to dismiss. Defendants' proposed motion day is approximately one week following the scheduled close of briefing per D.I. 35.

TO: THE CLERK OF COURT AND COUNSEL OF RECORD

PLEASE TAKE NOTICE that August 5, 2019, at 9:30 a.m. or as soon thereafter as counsel may be heard, Defendants Navient Corporation (“Navient”), John F. Remondi, Somsak Chivavibul, and Christian M. Lown (collectively, “Defendants”) will move, by and through the undersigned attorneys, before the Honorable Robert B. Kugler, U.S.D.J., for an order pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing the Second Amended Complaint in the above-captioned action with prejudice.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Defendants will rely upon the accompanying Memorandum of Law, Declaration of Sian B. Jones, and proposed Order, as well as all pleadings and other documents filed with the Court in this matter, including the motion to dismiss and documents in support thereof submitted by Defendants.

Oral argument is requested.

[signature page follows]

Dated: April 29, 2019

Respectfully submitted,

LATHAM & WATKINS LLP

By: /s/ Kevin M. McDonough
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